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January 30, 2025

Via ECF

The Honorable Valerie E. Caproni
 United States District Judge
 Southern District of New York
 40 Foley Square
 New York, NY 10007

<p>MEMO ENDORSED</p>

Re: Soto et al v. The Criterion Collection, LLC, Case No. 1:24-cv-07345-VEC
Joint Letter Requesting Stay of All Deadlines Pending Mediation

Dear Judge Caproni,


I represent Plaintiffs in the above matter. Together with my co-counsel and counsel for Defendant, I write jointly to request a stay of all case management deadlines—including those set forth in the Case Management Order (ECF No. 20) and Plaintiffs' deadline to respond to Defendant's Motion To Dismiss (ECF No. 15)—until after the Parties attend a private mediation on April 2, 2025.

Good cause exists to grant this request. As the Parties mentioned in their January 23, 2025 Joint Letter (ECF No. 18), "the Parties have agreed to proceed to mediation and are in the process of selecting a mediation and scheduling mediation." At that juncture, however, the Parties had not yet selected a mediator or set a date. Thus, on January 21, 2025, Defendant filed a Motion to Dismiss Plaintiffs' Consolidated Amended Complaint as to Plaintiffs' federal and state wiretapping claims (ECF No. 15). Plaintiffs' deadline to respond to that Motion is February 4, 2025. Similarly, on January 23, 2025, the Parties filed a [Proposed] Civil Case Management Plan and Scheduling Order (ECF No. 17), which the Court adopted the following day (ECF No. 20).

The Parties have now finalized the details of their mediation, and have agreed to mediate this matter with Marc Isserles, Esq. of JAMS on April 2, 2025. To allow the Parties to conserve their resources and focus their efforts on any potential settlement, the Parties jointly and respectfully request that the Court **stay all deadlines in the Case Management Order, as well as Plaintiffs' deadline to respond to the Motion to Dismiss**, until after the April 2, 2025 mediation. The Parties will update the Court regarding the status of this mediation on **April 9, 2025**, as well as any next steps in the case.

The Parties previously agreed to extend Defendant's deadline to respond to the initial Complaint and adjourn the Initial Pretrial Conference to allow for the consolidation of this matter with the *McGuire* action, which the Court granted (ECF No. 11).

Respectfully submitted,



Yitzchak Kopel

CC: All Counsel of Record (Via ECF)

Application GRANTED. All discovery deadlines in this matter, as well as Plaintiffs' deadline to oppose Defendant's motion to dismiss and Defendant's deadline to file reply papers, are STAYED pending the the outcome of the parties' mediation.

By **Wednesday, April 9, 2025**, the parties must file a joint letter updating the Court regarding the status of the mediation and proposed next steps, including whether to lift the stay.

SO ORDERED.



1/31/2025

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE